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## Kamens/At Last - document production

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**Walker G. Harman, Jr.** <wharman@theharmanfirm.com>

Mon, Oct 28, 2013 at 5:54 PM

To: Diane Windholz <windhold@jacksonlewis.com>

Cc: Peter Andrews <pandrews@theharmanfirm.com>, Lucas Larson <llarson@theharmanfirm.com>

Diane,

You did not respond to my previous email or Peter's email regarding your clients' failure to produce documents and improper withholding of documents.

Your clients' obligations are to produce documents as they are kept in the ordinary course of business and to identify which documents are responsive to which requests.

Your clients have not done this. You have refused to do this.

Peter has made every effort to confer and work with you on this prior to the Kamens' deposition. You will now cause all kinds of delay and confusion at the Kamens deposition.

As such, we have no choice but to file a motion to compel, and we will seek fees related to the failure to produce and any delays caused by the failure to produce.

Walker

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